

Annual Compliance Certification of CPNI - January 8, 2007
EB Docket No. 06-36 EB-06-TC-060

Through the submission of this certificate, I, Michael A. Lees, CPNI Compliance Officer for Western Communications, Inc., do certify that I have personal knowledge that Western Communications, Inc. has established procedures that adequately comply with the FCC CPNI requirements.

Western Communications, Inc. safeguards for the use of
Customer Proprietary Network Information. (CPNI)

Western Communications, Inc. has established a monitoring system that safeguards our Customer's Proprietary Network information. Our processing system includes the following procedures:

- a. The customer's approval must be obtaining and documented prior to the use of the customer's CPNI.
- b. All Western Communications, Inc. personnel who have access to the CPNI have received training as to the appropriate use of CPNI and are subject to a formal disciplinary process for the misuse of CPNI.
- c. Western Communications, Inc. maintains records of our marketing campaigns and all affiliates marketing campaigns where CPNI records are disclosed. These records include a description of each campaign, the specific CPNI information that was used in the campaign and what products or services were offered as a part of the campaign. Records for each campaign will be maintained for a minimum of twelve months.
- d. The Western Communications, Inc. compliance officer annually reviews the compliance process of Western Communications, Inc. with regard to the use of CPNI in outbound marketing programs. The compliance officer also reviews and approves any sales personnel request to use CPNI in any proposed outbound marketing program.
- e. The Western Communications, Inc. compliance officer will annually sign a compliance certificate stating that the officer has personal knowledge that Western Communications, Inc. has established procedures that are adequate to comply with the FCC CPNI requirements.
- f. The Western Communications, Inc. compliance officer is required to provide written notice to the FCC, within five business days, of any instance where the Western Communications, Inc. opt-out mechanism does not work properly. This written notice will be in the form of a letter to the FCC and shall include the name of Western Communications, Inc, a description of the opt-out mechanism(s) used, the problems experienced, the proposed remedy, the date the remedy was implemented, whether the South Dakota State PUC was

notified, a copy of the notice provided to the customers and the contact information for Western Communications, Inc.

Michael A. Lees
Western Communications, Inc. Compliance Officer
3106 South Highway 79
Rapid City, South Dakota 57701
Phone 605-342-7885

Dated: January 8, 2007

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 8, 2007.

Michael A. Lees